



California Regional Water Quality Control Board

Los Angeles Region



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Arnold Schwarzenegger
Governor

October 5, 2004

Mr. Stephen A. Fortune, Division Manager
Solid Resources, Engineering & Construction Division
City of Los Angeles
419 South Spring St., Suite 800
Los Angeles, CA 90013

RESPONSE TO COMMENTS ON TENTATIVE REVISED WASTE DISCHARGE REQUIREMENTS – LOPEZ CANYON LANDFILL, CITY OF LOS ANGELES, CALIFORNIA (File No. 69-068)

Dear Mr. Fortune:

Reference is made to your letter to this Regional Board, dated September 21, 2004, that transmitted comments on the tentative Waste Discharge Requirements (WDRs) and Monitoring and Reporting Program (M&RP) for the Lopez Canyon Landfill that we sent to the City of Los Angeles (City) on September 1, 2004. On September 22, 2004, Mr. John Hamilton of your staff submitted additional comments from the City's Environmental Monitoring Division (EMD) on the tentative WDRs and M&RP via an e-mail to the Regional Board. Our response to those comments and changes we made to the tentative documents are listed below.

Response to comments in the letter from Stephen Fortune on September 21, 2004:

- 1. Comment on Finding No. 24 of the tentative WDRs (Page 4):** *There are only 10 groundwater wells as listed—not eleven.*

Response: This error has been corrected.

- 2. Comment on Requirement C.2 of tentative WDRs (Page 8):** *The City needs several more months beyond the June 30, 2006 deadline to complete water balance performance evaluation report for the alternative final cover.*

Response: Requirement C.2 has been modified to read: *No later than October 30, 2006, the Discharger shall submit a final water balance performance evaluation report for the alternative final cover of the Landfill that includes monitoring data at the AB+ deck of the Landfill.*

- 3. Comment on Requirement D.3 of tentative WDRs (Page 9):** *"Impurities" referring to contamination in the green waste feedstock is an overly broad term that could imply*

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separating “to the maximum extent” out contamination (i.e. pesticides, particulate matter, bioaerosols) and other contaminants that are not easily visible to field personnel.

Response: For clearance, Requirement D.3 of the WDRs has been modified to read: *“Impurities that are not compatible to the operations at the Green Recycling Facility shall be separated, to the maximum extent feasible, before the green wastes are processed. Such wastes shall be collected and legally disposed offsite.”*

4. **Comment on Requirement D.4 of the tentative WDRs (Page 9):** *The word “precession” is not commonly used in composting. Does this refer to the screening of the compost through mechanical means (i.e. through a horizontal screener) or the mixing of compost via a compost turner or mechanical disc drum?*

Response: The word “precession” was a typographic error for processing. This error has been corrected.

5. **Comment on Provision H.5 of the tentative WDRs (Page 14):** *The requirement of a fully automated irrigation system is cost prohibitive. City staff does monitor its irrigation in order to avoid applying water in excess of what the vegetation needs.*

Response: The provision has be modified to read *“Any proposed irrigation system at the Landfill shall be designed to deliver only the amount of water necessary to sustain the growth of a healthy vegetative cover. The irrigation system shall be shut down to prevent over irrigation when the vegetation has received a sufficient amount of water. ”*

6. **Comment on Requirement I.B.7 of the tentative M&RP (Page T-3):** *The total volume of leachate and condensate is difficult to quantify due to small flows and seasonal changes. The City will do its best to provide an accurate number but it may be an approximation.*

Response: Requirement B.7 of the M&RP requires the City of to include “A summary of the total volume, on a monthly basis, of landfill leachate and gas condensate that has been discharged to the sanitary sewer system.” If it is impossible to obtain the accurate volumes of leachate and gas condensate, the City may use approximations, as long as such approximations are justified.

7. **Comment on Section I.B of the tentative M&RP (Page T-4):** *There are two section B’s.*

Response: This error has been corrected.

8. **Comment on Section I.C.5 of the tentative M&RP (Page T-6):** *This section is new and appears to have legal implication. We would like to have our attorney review it and therefore, we request a week extension to our review period.*

Response: As has been communicated and agreed between Board staff and City staff, Section C.5 (now D.5) of the M&RP contains the contingency response requirements when a release from the Landfill has proceeded beyond the facility boundary. These requirements are not new, but are included in Regional Board Order No. 93-062 (the Super Order) that was adopted on September 27, 1993. The Lopez Canyon Sanitary Landfill is subject to the requirements in the Super Order.

9. **Comment on Section II.A.5 of the tentative M&RP (T-7):** *Can Table 1 (of the tentative WDRs), Summary of Groundwater Monitoring Data at Lopez Canyon Landfill, be used to calculate intra-well concentration limits for Mpar? Will the statistical standard method of three standard deviations for upper limit be used to determine the concentration limits?*

Response: Table 1 of the tentative WDRs was generated using data prior to 2003 when Board staff started to draft the tentative WDRs. By the time the WDRs are adopted by the Regional Board, there will be new groundwater monitoring data available. The City should therefore re-develop the concentration limits for all well/MPar pairs at the Landfill using the procedure described in II.A.7.a of the M&RP. The upper limit of the tolerance interval of a constituent in a control chart should be determined following Section II.A.7.b of the M&RP. Details of allowable data analysis methods and data analysis method performance standards are provided in sections 20415(e)(8) and 20415(e)(9) of title 27 of California Code of Regulations (27 CCR), respectively.

10. **Comment on Section III.A.5.f of the M&RP (Page T-13):** *What specific qualifications are required from the laboratory personnel?*

Response: Considering that analyst qualifications are provided to the State of California as part of the environmental laboratory accreditation process, such requirements have been removed from Section III.A.5.f of the M&RP.

Response to comments from EMD on September 22, 2004:

11. **Comment on Table T-1 of the tentative M&RP (Page T-8):** *EMD would like to know the rationale behind the requirement to monitor alkali, alkaline earth metals, and iron. Typically, these elements are not considered pollutants. If there is no rationale for monitoring these constituents, EMD requests that they be dropped from the permit.*

Response: Although the mentioned constituents are normally not considered pollutants, they are indicators of the change of water quality. They are included in the monitoring program because the variation of their concentrations may indicate a release of landfill leachate.

- 12. Comment on Table T-1 of the tentative M&RP (Page T-8):** *Bromine (Br) is listed as a trace metal under the "Annually Monitored Parameters" portion of this table. Bromine is not a metal. Please check to ensure that this is not a typographical error. If so, it should be corrected.*

Response: This is a typographical error. Bromine has been removed from the list.

- 13. Comment on Requirements III.A.2 through III.A.4 of the tentative M&RP (Page T-12):** *Practical quantitation limit (PQL) is a new reporting requirement for landfill permits. State of California laboratory accreditation procedures address reporting limits (RL), but not PQL as stated in item A-3. The California SWRCB specifies the use of minimum levels (ML) in wastewater permits. It requested that PQL be replaced by ML.*

Response: Practical quantitation limit (PQL) is used the tentative WDRs and M&RP to be consistent with 27 CCR Section 20415(e) and title 40 of Code of Federal Regulations (40 CFR) section 258.53 and Appendix II. It is defined in Attachment A of the tentative WDRs. For the purpose of complying with the WDRs, the City may use reporting limits (RL) or minimum levels (ML) in lieu of PQL.

- 14. Comment on Requirements III.A.5.a of the tentative M&RP (Page T-12):** *Clarify or define the phrase "analytical detection limit". Method detection limit (MDL) is defined in Attachment A of the tentative permit, but analytical detection limit is not defined.*

Response: The phrase "analytical detection limit" in Requirements III.A.5.a of the tentative M&RP has been replace with "MDL and/or PQL."

- 15. Comment on Requirements III.A.5.c of the tentative M&RP (Page T-12):** *Delete the blanket requirement for reporting equipment blanks. It does not provide any information not provided by the method blank value and it is not required by all analytical methods used to generate monitoring data for this permit.*

Response: Requirements III.A.5.c of the tentative M&RP has been modified to read: *The results of method blanks.*

- 16. Comment on Requirements III.A.5.f of the tentative M&RP (Page T-12):** *Delete the requirement to provide analyst qualifications. The analyst qualification is already provided to the State of California as part of the environmental laboratory accreditation process.*

Response: Refer to Comment/Response No. 10 above.



- 17. Comment on Table T-1 (Page T-8) and Requirements III.A.1 (Page T-12) of the tentative M&RP:** *Table T-1 specifies the use of EPA Method 8270 for analysis of semi-volatile organic compounds. Item A-1 on page T-12 specifies the use of the method with the lowest MDL when more than 90% of the historical concentrations for a compound are non-numerical determinations (i.e., non-detected). In certain situations, these two requirements will conflict. For example, polyaromatic hydrocarbons are not detected more than 90% of the time. Per table T-1, EMD would continue to use EPA Method 8270. Per item A-1, EPA Method 8310 should be used to monitor PAHs. Which requirement supercedes in this situation?*

Response: To be consistent with the other constituents listed the table, the analytical methods specifications following Volatile organic compounds and Semi-volatile organic compounds in Table T-1 have been deleted. As required by Section III.A of the M&RP, sample collection, storage, and analysis shall be performed according to the most recent version of Standard USEPA Methods (USEPA publication 'SW-846'), and in accordance with a sampling and analysis plan acceptable to the Executive Officer.

- 18. Comment on Requirements III.A.7 of the tentative M&RP (Page T-13):** *This requires the use of a second column or second method to "more accurately" identify and quantify "significant" unknown peaks. The need to identify and quantify unknown peaks is reasonable, but the means of performing said identification and quantification should be left to the discretion of the analytical laboratory and not prescribed in this permit. If there is some doubt about the quality of the identification and quantitation, RWQCB should require that the analytical laboratory provide backup documentation (i.e., chromatographs, mass-spectra, and standard curves as appropriate).*

Response: Requirements III.A.7 has been modified to read: "Non-targeted chromatographic peaks shall be identified, quantified, and reported to a reasonable extent."

Enclosed are copies of the revised tentative WDRs and M&RP¹. As a result of the revisions, the tentative Order will not be heard at the October 7, 2004 Board meeting as previously scheduled. Instead, the item has been continued to the next regular Board meeting, on **November 4, 2004, at 9:00 a.m.**, at the Metropolitan Water District of Southern California, 700 North Alameda Street, Los Angeles.

Any further written comments or testimony regarding this tentative Order must be received at the Regional Board's office by the close of business **October 17, 2004**, in order to be evaluated by Board staff and included in the Board's agenda folder. Comments received after that date will be

¹ To save printing and postage costs, the revised Tentative Requirements are sent only to the addressee. These documents may be viewed at the internet at http://www.swrcb.ca.gov/rwqcb4/html/permits/all_tentative_permits.html.



Mr. Stephen Fortune
Lopez Canyon Landfill

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October 5, 2004

provided, ex agenda, to the Board for their consideration. Timely submittal of written comments is encouraged to ensure that all comments are accurately and fully included in the administrative record, that Board staff is able to provide timely review, and that Regional Board members have sufficient time to give full consideration to the comments and issues raised. Comments received after the requested date may result in delay in consideration of the tentative Order.

If you have any questions or need additional information, please call Dr. Wen Yang at (213) 620-2253.

Sincerely yours,

RODNEY H. NELSON
Senior Engineering Geologist
Landfills Unit

Enclosures:

Letter from Stephen Fortune of City of Los Angeles to Regional Board, September 21, 2004
E-Mail from John Hamilton of City of Los Angeles to Regional Board, September 22, 2004
Revised Tentative Waste Discharge Requirements
Revised Tentative Monitoring and Reporting Program

cc: Joe Mello, Land Disposal Program, State Water Resource Control Board
Michael Lauffer, Office of Chief Counsel, State Water Resources Control Board
Robert Sams, Office of Chief Counsel, State Water Resources Control Board
Peter Janicki, California Integrated Waste Management Board, Sacramento
Raymond Seamans, California Integrated Waste Management Board, Sacramento
David Thompson, City of Los Angeles, Environmental Affairs Department
Steve Smith, South Coast Air Quality Management District
Mark Mackowski, Upper Los Angeles River Area Watermaster
Doug Walters, Bureau of Sanitation, City of Los Angeles
Mistie Joyce, Bureau of Sanitation, City of Los Angeles

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